

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Joseph Walker	:	CHAPTER 13
Debtor	:	BANKRUPTCY NO.19-12097
M&T Bank	:	Motion to Dismiss
v.	:	
Joseph Walker	:	

**APPLICATION TO ENLARGE TIME TO FILE BRIEFS**

Debtor, by his attorney, moves this Court, pursuant to Bankruptcy Rule 9006(b)(1), to enlarge the time for the parties to file their briefs in the above referenced matter by eleven days. In support of this application Debtor, through his attorney states as follows:

1. Debtor's attorney had to become involved in an emergency matter that has turned out to be more complicated and involved than anticipated and has required over the last two and 1/2 weeks extended and time sensitive action to avoid irreparable harm to a client in another case..

2. As result, Debtor's counsel has been unable to work on the brief that is due today in the instant matter.

3. Debtor through counsel request an eleven day extension of the briefing deadlines in the matter to accommodate this unexpected occurrence.

4. No prejudice will result to any party as the result of the change in the deadlines.

WHEREFORE, Debtor prays this Court to enlarge the briefing schedule for eleven days

as provided in the proposed order.

Respectfully submitted,

/s/Irwin Trauss  
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